

IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

CASE NO.: 1:07-CV-8302-DC

ACCESS 4 ALL, INC., a Florida Non-Profit
Corporation, and PETER SPALLUTO, Individually,

Plaintiffs,

v.

IROQUOIS HOTEL, L.L.C., a New York Limited
Liability Corporation,

Defendant.

STIPULATION FOR APPROVAL AND ENTRY OF
CONSENT DECREE AND DISMISSAL OF CASE WITH PREJUDICE

Plaintiffs and Defendant, by and through undersigned counsel, hereby move this Court to approve and enter judgment on the Proposed Consent Decree annexed hereto as Exhibit A ("the Consent Decree").

Pursuant to Title III of the Americans with Disabilities Act this Court is authorized to enter a Consent Decree requiring a public accommodation to alter facilities to make such facilities readily accessible to and useable by individuals with disabilities to the extent required by Subchapter III of Chapter 126 of Title 42 of the United States Code. 42 USC § 12188 (a)(2) 2000.

Wherefore, Plaintiffs and Defendant respectfully request this Court to approve and enter judgment on the Consent Decree and retain jurisdiction to enforce the Consent Decree and Dismiss the Case with Prejudice.

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Date: 12 June 2008